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ATTORNEYS

September 10, 2020

VIA ECF

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Ohanian, et al. v. Apple Inc., et al.*
Case No. 20-cv-05162 (LGS)

Dear Judge Schofield:

This law firm represents Plaintiffs Tigran Ohanian and Reggie Lopez in the above-captioned action. Pursuant to the Court's September 4, 2020 Order (Dkt. No. 39), we write in response to Defendants Apple Inc. and T-Mobile USA, Inc.'s letter motion dated September 3, 2020 (Dkt. No. 35) requesting that the Court stay all discovery in this action pending the resolution of Defendants' pending motions to compel arbitration (Dkt. Nos. 30 and 33).

Without waiving any of Plaintiffs' arguments concerning the merit of Defendants' respective motions to compel arbitration – which Plaintiffs will oppose in accordance with the briefing schedule entered by the Court on September 4, 2020 (Dkt. No. 39) – Plaintiffs do not oppose a stay of discovery with the exception of Initial Disclosures.

Pursuant to the Court's August 25, 2020 Order (Dkt. No. 26), the parties' Initial Disclosures are to be completed by today, September 10, 2020, and Plaintiffs plan to comply with that deadline. Initial Disclosures would constitute little to no burden on Defendants, and are routinely completed during the early stages of litigation, even when a stay of discovery is sought.

We thank the Court for its time and attention to this matter.

Respectfully,

/s/ Aaron J. Solomon

Aaron J. Solomon, Esq.

cc: All Counsel of Record (via ECF)



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